

# EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS**

**WACKER DRIVE EXECUTIVE SUITES,  
LLC, on behalf of itself, individually, and on  
behalf of all others similarly situated,**

**Plaintiff,**

**v.**

**JONES LANG LASALLE AMERICAS  
(ILLINOIS), LP,**

**Defendant.**

**Case No. 1:18-cv-5492**

**Magistrate Judge Sunil R. Harjani**

**AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION**

**To:** Philip A. Miscimarra  
Scott T. Schutte  
Stephanie L. Sweitzer  
Kevin F. Gaffney  
Heather J. Nelson  
MORGAN, LEWIS & BOCKIUS LLP  
77 West Wacker Drive, 5th Floor  
Chicago, IL 60601  
Tel: 312.324.1000  
Fax: 312.324.1001  
philip.miscimarra@morganlewis.com  
scott.schutte@morganlewis.com  
stephanie.sweitzer@morganlewis.com  
kevin.gaffney@morganlewis.com  
heather.nelson@morganlewis.com

Please take notice that, pursuant to Federal Rule of Civil Procedure 30(b)(6), counsel for Plaintiff will depose Defendant Jones Lang Lasalle Americas (Illinois) L.P.'s ("JLL's") designated representative by oral examination beginning at **9 a.m. CST on December 20, 2019** and continuing thereafter from day to day until complete. The deposition will take place before a person duly authorized to administer oaths at the offices of Morgan, Lewis, & Bockius LLP, 77 W. Wacker Drive, 5<sup>th</sup> Floor, Chicago, Illinois 60601.

For this deposition, JLL is hereby directed to designate and present any such officers, directors, managing agents, or other persons who consent to testify on its behalf as to matters known or reasonably available to Defendant concerning the following topics:

- (1) How JLL earns fees from its landlord clients at the building from tenant construction (build outs);
- (2) The process by which JLL checks the union cards/membership of contractors working for tenants, and what happens if a contractor does not have such cards/evidence of membership;
- (3) The basis for JLL's claim, as asserted in its Motion to Dismiss, that its landlord clients have requested the union-only rule as to tenant improvements;
- (4) The total amount of fees earned by JLL from its landlord clients from overseeing tenant construction projects at each building;
- (5) Whether JLL imposes the union-only rule at buildings it manages in Illinois outside the Chicago Loop and if not, the reasons for not doing so;
- (6) The nature of JLL's communications with the Building Owners Management Association (BOMA) about labor relations, i.e., which topics have been discussed, with whom at BOMA, and JLL's involvement in BOMA's Labor Committee, what notes exist from these meetings, the dates of the meetings;
- (7) Whether the union only rule has been in effect at 180 N. LaSalle St. and 111 S. Wacker Dr. for tenant contractors and movers and the applicable time periods, and if not, the reasons it has not been in effect;
- (8) Whether JLL's "competitive bidding" for construction work at the buildings, which is a service JLL offers its landlord clients, includes receiving bids from non-union contractors. If not, then how this failure to receive competitive bids from non-union contractors been communicated to landlord clients;
- (9) Whether the union-only rule was in effect at the five buildings JLL no longer manages but managed during the class period;
- (10) Whether JLL has discussed the union only rule with its landlord clients and if so the reasons for the rule and implications of not having it, i.e., the possibility of unions picketing the buildings;
- (11) The basis for any claim by JLL that the use of union contractors is an individual choice made by each tenant; and

- (12) Whether JLL or its landlord clients pays for tenant improvement allowances at the buildings, and whether the allowances amortized over the course of the leases plus interest.

Dated: December 2, 2019

Respectfully Submitted,

/s/ Anna M. Ceragioli

James B. Zouras  
Ryan F. Stephan  
Anna M. Ceragioli  
Stephan Zouras, LLP  
100 N. Riverside Plaza, Suite 2150  
Chicago, Illinois 60606  
312-233-1550  
312-233-1560 f  
jzouras@stephanzouras.com  
rstephan@stephanzouras.com  
aceragioli@stephanzouras.com

Howard Foster  
Matthew Galin  
FOSTER PC  
150 N. Wacker Dr.  
Suite 2150  
Chicago, IL 60606  
(312) 726-1600  
hfoster@fosterpc.com  
mgalin@fosterpc.com

Aaron Walner  
THE WALNER LAW FIRM LLC  
555 Skokie Boulevard, Suite 250  
Northbrook, Illinois 60062  
Tel: (312) 371-2308  
awalner@walnerlawfirm.com

**ATTORNEYS FOR PLAINTIFF**